

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

NELSON L. BRUCE,

Plaintiff,

v.

PENTAGON FEDERAL CREDIT UNION
a/k/a PENTAGON FEDERAL CREDIT
UNION, EXPERIAN INFORMATION
SOLUTIONS, INC., TRANS UNION, LLC,
EQUIFAX INFORMATION SERVICES,
LLC, LEXISNEXIS RISK SOLUTIONS,
INC., and UNKNOWN DOES 1-100,

Defendants.

Case No.: 2:22-cv-02211-BHH-MGB

**DEFENDANT TRANS UNION LLC'S
MOTION FOR LEAVE TO FILE ADDITIONAL PAGES**

COMES NOW, Defendant Trans Union LLC (“Trans Union” or “Defendant”), and files this its Motion for Leave to File Additional Pages (“Motion”). Trans Union respectfully requests that this Court enter an order allowing Trans Union to exceed the thirty-five (35) page limit for briefs in support of motions in this Court and would respectfully show the Court as set forth below:

1. Pursuant to Local Civil Rule 7.05(B)(1), initial briefs supporting motions are limited to thirty-five (35) double spaced pages.
2. The dispositive motion deadline is April 11, 2025. ECF No. 398.
3. Plaintiff has asserted that Trans Union violated §§ 1681e(b) and 1681i the federal Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* (“FCRA”). *See* Complaint and Amended Complaints (ECF No. 1, 31, 98, 171, 298). Plaintiff has also asserted claims for violations of

South Carolina Code §§ 37-20-170, *et seq.* and 37-20-200, *et seq.* and common law defamation. *See id.*

4. In order to comprehensively address Plaintiff's numerous claims, Trans Union respectfully requests leave to file up to fifteen (15) additional pages to its brief supporting its Motion for Summary Judgment, if necessary. Trans Union will endeavor to include only information relevant to the questions of law raised by Plaintiff's claims. Counsel will diligently edit the motion for summary judgment to ensure that the final work product is concise and focused on material facts. Trans Union believes that the number of causes of action and the complexity of Plaintiff's exotic and novel theories brought by Plaintiff in this matter constitute an extraordinary and compelling reason for granting this request.

5. This request for leave is made in good faith and is not sought for the purposes of delay. Further, granting Trans Union's motion will not prejudice any party.

WHEREFORE, for the reasons set forth herein, Trans Union respectfully requests leave to each file an additional fifteen (15) pages in its brief in support of its Motion for Summary Judgment in this matter.

Respectfully submitted,

s/ Wilbur E. Johnson

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th of March 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

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I further certify that I forwarded a copy of the foregoing by U.S. First Class Mail to the following non-CM/ECF participants:

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